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August 19, 2025

Via ECF

The Honorable Edgardo Ramos
United States Courthouse
40 Foley Square
New York, NY 10007
Courtroom: 619

Re: Daniel Arsham, v. Quavious Keyate Marshall, Docket No. 25-cv-02668-ER

Joint Request for a Limited Stay of Certain Pretrial Deadlines

Dear Hon. Judge Ramos:

We represent Plaintiff Daniel Arsham (“Plaintiff”) in the above-referenced action. Plaintiff and Defendant Quavious Keyate Marshall (“Defendant”) (collectively, the “Parties”) jointly and respectfully request a limited stay of certain pretrial deadlines.

Defendant appeared in this matter on July 17, 2025. *See* ECF No. 28. Under Federal Rule of Civil Procedure 16(b), a scheduling order must be entered within 60 days of the defendant’s appearance “unless the [C]ourt finds good cause for delay.” Fed. R. Civ. P. 16(b). Pursuant to Rules 16(b) and 26(f), the Parties are required to confer at least 21 days before the scheduling order is due and to file a joint report within 14 days thereafter, unless the Court orders otherwise. Fed. R. Civ. P. 26(f). Accordingly, the Parties are currently required to confer by **August 25, 2025**, and submit their joint report by **September 8, 2025**.

As previously noted before the Court on August 12, 2025, the Parties have requested a settlement conference before Mag. Judge Katharine H. Parker. *See* ECF No. 35. A teleconference has been scheduled for September 25, 2025, to set a date for that settlement conference. *See* ECF No. 36. The Parties believe there is good cause to stay the current deadlines because they are hopeful that, with the Court’s assistance, an early and amicable resolution may be reached at the settlement conference.

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In light of these anticipated proceedings, the Parties respectfully request that the deadlines under Rules 16 and 26 be stayed. If the matter is not resolved at the settlement conference, the Parties propose to submit the case management order within 21 days after the conference.

The Parties thank the Court for its consideration of this request and for its continued attention to this matter.

Sincerely,

/s/ Vivek Jayaram

Vivek Jayaram

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cc: All counsel of record via CM/ECF